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9 Attorneys for Defendant
JASON EDWARD THOMAS CARDIFF
10

11 UNITED STATES DISTRICT COURT
12 CENTRAL DISTRICT OF CALIFORNIA
13

14 UNITED STATES OF AMERICA,

15 Plaintiff,

16 vs.

17 JASON EDWARD THOMAS
18 CARDIFF,

19 Defendant.
20
21

Case No. 5:23-cr-00021-JGB

**JASON CARDIFF'S REPLY IN
SUPPORT OF *EX PARTE*
APPLICATION AND REQUEST TO
PARTICIPATE AND ATTEND
JANUARY 30, 2025 MOTIONS
HEARING BY VIDEO
CONFERENCE**

22
23 The Government's opposition is overstated and over the top. Mr. Cardiff is not
24 a fugitive within the meaning of the Fugitive Entitlement doctrine. Defendant's
25 reason for staying in Ireland was to follow his doctor's orders not to fly until he
26 completes a 3-4 month course of treatment with a return to the United States almost
27 seven weeks prior to trial in July, 2025. Defendant had a Hobson's choice—comply
28

1 with the Court's order with a high risk of permanently damaging his pulmonary
2 system, or follow his doctor's orders.

3 As to the Government's claim that Mr. Cardiff is a fugitive, Mr. Cardiff did not
4 flee to Ireland but was granted leave to travel to Ireland. His location is well known
5 and he is in contact with Pretrial Services per the Court's last order extending travel.
6 The Government wants to have it both ways, penalize Mr. Cardiff for not wanting to
7 risk even more serious health consequences by returning to the United States while
8 delaying any explanation to the Court as to why the Government directed his arrest
9 while on a court-authorized travel to his home in Ireland.

10 Mr. Cardiff should not be penalized and deprived of his right to participate in
11 pretrial motions for unexpected health issues when he can participate by video
12 conference.

13 Dated: January 29, 2025

14
15 By: /s/ Stephen R. Cochell

16 Stephen R. Cochell

17 Attorney for Defendant

18 JASON EDWARD THOMAS CARDIFF

19 **SERVICE LIST**

20 I HEREBY DECLARE THAT THE FOLLOWING COUNSEL HAVE BEEN
21 SERVED WITH THIS DEFENDANT JASON CARDIFF'S NOTICE OF MOTIO
22 AND MOTION TO SUPPRESS EVIDENCE THROUGH THE COURT'S ECF O
NEXT GEN ELECTRONIC FILING SYSTEM:

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24 States Attorney Mack E.
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8 /S/ Stephen R. Cochell
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